

To: Federal Communications Commission

From: Charles Logan Dietz  
W5PR

Subject: Comment on RM-10352

I have been an active amateur radio operator for more than forty-four years. My amateur call is W5PR. I do NOT support RM-10352 for the following reasons:

Amateur radio operators in other countries are not restricted in a like manner. This would be another instance of the F.C.C. restricting U.S. citizens' privileges more narrowly than those afforded to citizens of other countries by their governments. I think all such band plans which are not mandated by treaty should be abolished. Single Sideband communication is increasing daily and the U.S. has more amateurs than any other country. The F.C.C. has restricted U.S. amateurs to a more narrow band limit for SSB than almost any other country on the 80, 20, 15 and 10 meter allocations which are the principal HF amateur bands. Thus the congestion in the SSB portions of most HF amateur bands can and does reach the point where only those using maximum power and huge yagi arrays can communicate.

This would be a good opportunity to revisit this entire situation. SSB should be allowed for U.S. amateurs either a) on all frequencies allowed by treaty (as in most countries), or b) on all but a VERY limited portion of the bottom of each HF amateur band such as: 1.800-1.820 and the bottom 100 khz of the other HF bands where allowed by treaty. The IARU band plan for Region 2 has withstood the test of time and would be an excellent plan to adopt. At least then U.S. amateurs would be afforded similar privileges to amateurs in other countries.

The principal reason for these restrictions on SSB communication is usually that the modes cannot coexist. While I do not agree with this assessment, I believe it is as much true for the narrow modes (principally CW) as the wide modes (principally SSB). The proponents of these plans almost never ask for the narrow modes to be restricted, however. I think the proponents must be principally CW operators.

On the 1.8 mhz band, many countries are still limited to narrow frequency allocations. RM-10352 would seek to restrict U.S. amateurs from transmitting SSB on almost all of these foreign allocations saying the foreign stations can be contacted by U.S. amateurs on Asplit@ frequencies (separate transmit and receive frequencies). This is now done by U.S. SSB operators on the 7 mhz amateur band with such poor results that it is one of the least used amateur HF allocations for intercontinental SSB contacts while propagation would dictate it to be one of the best frequency bands for long distance contacts at night. The U.S. amateurs are restricted to transmitting SSB on a portion of the 7 mhz band which is shared by high powered foreign broadcast stations, while other countries as well as the IARU Region 2 band plan allow amateur operators to transmit SSB in the lower portions of the band where there is less interference.

The 1.8 mhz band is arguably one of the most interesting of the amateur frequency allocations. It is also one of the smallest allocations. During contests and other operating events, the band can and does fill up from end-to-end with stations on whatever mode is called for by the event. While I would not be against a small portion of the bottom of the band (say 1.800-1.820) being allocated for CW so that it is not Aobliterated@ by a SSB operating event, I think any greater restriction on SSB would perhaps increase the enjoyment of CW operators a small amount at the expense of decreasing the enjoyment of SSB operators a great amount.

As a footnote, the novice SSB allocation from 28.3-28.5 mhz of the 10 meter band should be reconsidered also. This allocation should be expanded to include most, if not all of the SSB allocation for higher classes of licenses. The attempted contact of novices on SSB by all licence classes especially during contests and other operating events has caused major congestion in the 28.3-28.5 mhz region. When code speeds were lowered and novice class amateurs were given the 28.3-28.5 mhz SSB allocation many higher class amateurs predicted doom for amateur radio. They said it would become another CB nightmare of interference and profanity. Not only has this not come true, but the operating experience on the 10 meter amateur band has been enhanced for all classes of licensees.

It is time to trust U.S. citizens with the same privileges that other countries trust their citizens with. It is time to expand SSB privileges for U.S. amateur operators to be the same as amateur operators in other countries in IARU Region 2.

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